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Board of Vocational Nursing
and Psychiatric Technicians

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**BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2005-1126

LAKESHA LANAE JONES
1215 S. York Avenue
Glendora, CA 91740
Vocational Nurse License No. VN 189434

A C C U S A T I O N

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this
Accusation solely in her official capacity as the Executive Officer of the Board of Vocational
Nursing and Psychiatric Technicians, Department of Consumer Affairs.

2. On or about September 28, 1999, the Board of Vocational Nursing and
Psychiatric Technicians (Board) issued Vocational Nurse License Number VN 189434 to
Lakesha Lanae Jones (Respondent). The Vocational Nurse License was in full force and effect at
all times relevant to the charges brought herein. It expired on September 30, 2007, and has not
been renewed.

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3. This Accusation is brought before the Board under the authority of the

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1 7. Section 490 of the Code states:

2 A board may suspend or revoke a license on the ground that the licensee
3 has been convicted of a crime, if the crime is substantially related to the
4 qualifications, functions, or duties of the business or profession for which the
5 license was issued. A conviction within the meaning of this section means a plea
6 or verdict of guilty or a conviction following a plea of nolo contendere. Any
7 action which a board is permitted to take following the establishment of a
8 conviction may be taken when the time for appeal has elapsed, or the judgment of
9 conviction has been affirmed on appeal, or when an order granting probation is
10 made suspending the imposition of sentence, irrespective of a subsequent order
11 under the provisions of Section 1203.4 of the Penal Code.

12 8. Code Section 2875 provides, in relevant part, that the Board may
13 discipline the holder of a vocational nurse license for any reason provided in Article 3
14 (commencing with section 2875) of the Vocational Nursing Practice Act.

15 9. Section 2878 of the Code states:

16 The Board may suspend or revoke a license issued under this chapter [the
17 Vocational Nursing Practice Act (Bus. & Prof. Code, 2840, et seq.)] for any of
18 the following:

19 (a) Unprofessional conduct, which includes, but is not limited to, the
20 following:

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22 (b) Procuring a certificate by fraud, misrepresentation, or mistake.

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24 (d) Violating or attempting to violate, directly or indirectly, or
25 assisting in or abetting the violating of, or conspiring to violate any provision or
26 term of this chapter.

27 (e) Making or giving any false statement or information in connection
28 with the application for issuance of a license.

29 (f) Conviction of a crime substantially related to the qualifications,
30 functions, and duties of a licensed vocational nurse, in which event the record of
31 the conviction shall be conclusive evidence of the conviction.

32 (j) The commission of any act involving dishonesty, when that action
33 is related to the duties and functions of the licensee.

34 10. Section 2878.6 of the Code states:

35 A plea or verdict of guilty or a conviction following a plea of nolo
36 contendere made to a charge substantially related to the qualifications, functions
37 and duties of a licensed vocational nurse is deemed to be a conviction within the

1 meaning of this article. The board may order the license suspended or revoked, or
2 may decline to issue a license, when the time for appeal has elapsed, or the
3 judgment of conviction has been affirmed on appeal or when an order granting
4 probation is made suspending the imposition of sentence, irrespective of a
5 subsequent order under the provisions of Section 1203.4 of the Penal Code
6 allowing such person to withdraw his plea of guilty and to enter a plea of not
7 guilty, or setting aside the verdict of guilty, or dismissing the accusation,
8 information or indictment.

9 FIRST CAUSE FOR DISCIPLINE

10 (Convictions of Substantially-Related Crimes)

11 11. Respondent is subject to disciplinary action under Code section 2878,
12 subdivision (f), and section 2878.6, as a result of her convictions of crimes that are substantially
13 related to the qualifications, functions, and duties of a vocational nurse.

14 a. On June 28, 2007, Respondent was convicted on her plea of
15 nolo contendere of one felony count of violating Vehicle Code section 10851,
16 subdivision (a) [driving a vehicle without the owner's consent], and one
17 misdemeanor count of violating Vehicle Code section 14601.1, subdivision (a)
18 [driving with a suspended license] in a criminal proceeding entitled *The People of*
19 *the State of California v. Lakesha Lanae Jones* (Super. Ct. Los Angeles County,
20 2007, No. KA079566). While on routine patrol on June 20, 2007, police officers
21 checked the license plate of the 2004 Kia that Respondent was driving. This
22 check revealed that the 2004 Kia had been reported as stolen by the Chariot Car
23 Rental Company in Long Beach, California. Although Respondent had rented the
24 Kia from Chariot Car Rental for a one-week period, she kept the vehicle for more
25 than six weeks. During those six weeks, Respondent failed to respond to
26 numerous phone calls and letters from Chariot Car Rental demanding the return of
27 the vehicle. When questioned by the arresting officers, Respondent stated,
28 "I know I was supposed to return the vehicle several weeks ago."

29 b. On April 20, 2006, Respondent pled guilty and was
30 convicted of one misdemeanor count of violating Penal Code section 530.5,
31 subdivision (a) [the unlawful use of another person's identity to obtain goods and

1 services] in a criminal proceeding entitled *The People of the State of California v.*
2 *Lakesha Lanae Jones* (Super. Ct. Los Angeles County, 2005, No. VA086695).

3 The underlying circumstances revolve around Respondent's actions on or about
4 July 1, 2003, when Respondent willfully and unlawfully obtained the personal
5 identifying information of her sister, Kimesha Stevenson, and used that
6 information unlawfully to obtain credit, good, services, and information in the
7 name of Ms. Stevenson.

8 c. On September 24, 2004, Respondent was found guilty by
9 the Court and convicted of one misdemeanor count of violating Penal Code
10 section 530.5, subdivision (a) [the unlawful use of another person's identity to
11 obtain goods and services] in a criminal proceeding entitled *The People of the*
12 *State of California v. Lakesha Lanae Jones* (Super. Ct. Los Angeles County,
13 2004, No. VA082854). On or about February 20, 2003, Respondent unlawfully
14 used the personal identity information of her sister, Kimesha Stevenson, to enter
15 into a lease and rent an apartment in her sister's name, without her sister's
16 consent. After entering into a rental agreement, Respondent failed to pay three
17 months' rent and was evicted. When Ms. Stevenson was subsequently notified of
18 a wage garnishment as a result of Respondent's non-payment of rent, she filed a
19 police report on October 23, 2003.

20 SECOND CAUSE FOR DISCIPLINE

21 **(Making a False Statement on a License Renewal Application)**

22 12. Respondent is subject to disciplinary action under Code section 2878,
23 subdivision (e), for making a false statement on her license renewal application. On October 27,
24 2005, Respondent signed her Renewal Application for her Licensed Vocational Nurse License,
25 swearing under penalty of perjury, that the information on the renewal was true and correct.
26 Although Respondent had been convicted on September 24, 2004, of one misdemeanor count of
27 violating Penal Code section 530.5, subdivision (a) [the unlawful use of another person's identity
28 to obtain goods and services] in a criminal proceeding entitled *The People of the State of*

1 *California v. Lakesha Lanae Jones* (Super. Ct. Los Angeles County, 2004, No. VA082854), she
2 answered "No" to the question, "Since you last renewed your license, have you been convicted of
3 or pled nolo contendere to any violation of any law of any state in the United States or a foreign
4 country?"

5 THIRD CAUSE FOR DISCIPLINE

6 (Fraudulently Obtaining License Renewal)

7 13. Respondent is subject to disciplinary action under Code section 2878,
8 subdivision (b) for fraudulently obtaining her license renewal, as set forth above in paragraph 12.

9 FOURTH CAUSE FOR DISCIPLINE

10 (Dishonest Acts)

11 14. Respondent is subject to disciplinary action under Code section 2878,
12 subdivision (j) for committing dishonest acts, as set forth above in paragraphs 11-13.

13 FIFTH CAUSE FOR DISCIPLINE

14 (Unprofessional Conduct)

15 15. Respondent is subject to disciplinary action under Code section 2878,
16 subdivision (a) for engaging in unprofessional conduct, as set forth above in paragraphs 11-14.

17 SIXTH CAUSE FOR DISCIPLINE

18 (Violating Provisions of the Vocational Nursing Practice Act)

19 16. Respondent is subject to disciplinary action under Code section 2878,
20 subdivision (d) for violating numerous provisions of the Vocational Nursing Practice Act [Code
21 section 2875, et seq.], as set forth above in paragraphs 11-15.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Vocational Nurse License Number VN 189434, issued to Respondent;
2. Ordering Respondent to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and
3. Taking such other and further action as is deemed necessary and proper.

DATED: April 29, 2008


TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer
Board of Vocational Nursing and Psychiatric Technicians
Department of Consumer Affairs
State of California
Complainant